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February 26, 2009

Mr. Sam Chummar
Work Assignment Manager (SR-6J)
Remedial Response Unit No. 1
U.S. Environmental Protection Agency Region 5
77 West Jackson Boulevard
Chicago, IL 60604

Subject: Data Management Plan (DMP) for Remedial Investigation/Feasibility Study (RI/FS) Oversight Activities at Plainwell Mill Site, Operable Unit No. 7 of Allied Paper, Inc./Portage Creek/Kalamazoo River Site Plainwell, Allegan County, Michigan Contract No. EP-S5-06-02, Work Assignment No. 041-RSBD-059B

Dear Mr. Chummar:

SulTRAC is submitting the enclosed Data Management Plan (DMP) that provides information about the procedures to be used for handling, reporting, evaluating, storing, securing, and accessing data collected from the above-referenced site in Plainwell, Allegan County, Michigan. The DMP is one of the site-specific plans for the Plainwell Mill Site and is being submitted as required by the EPA Statement of Work dated November 3, 2008, for the work assignment. The DMP will be revised if any comments are received from EPA.

If you have any questions about the enclosed DMP, please call me at (312) 201-7491.

Sincerely,

Jeffrey J. Lifka
Project Manager

Enclosure

cc: Norvelle Merrill-Crawford, EPA Contracting Officer (letter only)
Ron Riesing, SulTRAC Program Manager (letter only)
File

**REMEDIAL ACTION CONTRACT 2 FOR
REMEDIAL, ENFORCEMENT OVERSIGHT, AND
NON-TIME CRITICAL REMOVAL ACTIVITIES
IN REGION 5**

**DATA MANAGEMENT PLAN FOR
REMEDIAL INVESTIGATION/FEASIBILITY STUDY (RI/FS) OVERSIGHT ACTIVITIES AT
PLAINWELL MILL SITE, OPERABLE UNIT NO. 7 OF
ALLIED PAPER, INC./PORTAGE CREEK/KALAMAZOO RIVER SITE
PLAINWELL, ALLEGAN COUNTY, MICHIGAN**

**Prepared for
United States Environmental Protection Agency
Region 5
77 West Jackson Boulevard
Chicago, IL 60604**

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|------------------------------|-------------------|
| Date Submitted: | February 26, 2009 |
| EPA Region: | 5 |
| Work Assignment No: | 041-RSBD-059B |
| Contract No: | EP-S5-06-02 |
| Prepared by: | SulTRAC |
| Project Manager: | Jeffrey Lifka |
| Telephone No: | (312) 201-7491 |
| EPA Work Assignment Manager: | Sam Chummar |
| Telephone No: | (312) 886-1434 |

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1.0 INTRODUCTION

SulTRAC has prepared this data management plan (DMP) as a supporting document to the sampling and analysis plan (SAP) (SulTRAC 2009) for the Plainwell Mill Site, Operable Unit No. 7 of the Allied Paper, Inc./Portage Creek/Kalamazoo River Site (Plainwell Mill site). The plan was prepared under the U.S. Environmental Protection Agency (EPA) Remedial Action Contract (RAC) 2 for Region 5, Contract No. EP-S5-06-02, Work Assignment (WA) No. 041-RSBD-059B. This WA, presented in the November 2008 statement of work (EPA 2008), requires SulTRAC to oversee a remedial investigation and feasibility study (RI/FS) that will be conducted at the Plainwell Mill site by the potentially responsible party (PRP), Weyerhaeuser Company, and its consultant, RMT, Inc. (RMT). SulTRAC will perform split sampling and oversight during Phase II of the PRP-led RI activities. Phase II of the RI is tentatively scheduled to begin in Spring 2009, subsequently followed by FS activities to continue until March 2011. This DMP describes how the data collected during the RI/FS oversight will be managed.

The following field investigations at the Plainwell Mill site may be performed as part of the RI oversight activities. Because the PRP consultant's work plan has not been approved at the time of this DMP submittal, oversight investigations may vary from the following bulleted items:

- Geological Investigation – The PRP may conduct additional geological investigations and collect test pit soil samples at the Plainwell Mill site. SulTRAC will provide oversight and collect split samples at a frequency of 25 percent of the total number of samples.
- Hydrogeologic Investigations – The PRP may install additional monitoring wells and collect groundwater samples. SulTRAC will provide oversight and collect split samples at a frequency of 25 percent of the total number of samples.
- Miscellaneous Investigations – The PRP may conduct additional investigations outside of what is proposed in its preliminary field sampling plan (FSP) (RMT 2008). SulTRAC may therefore collect surface water and sediment split samples at a frequency of 25 percent of the total number of samples in addition to soil and groundwater split samples.

It is expected that all split samples will be analyzed through EPA's Contract Laboratory Program (CLP).

Data management provides the orderly collection, identification, storage, retrieval, and analysis of information generated by the field activities proposed within the SAP at the Plainwell Mill site

(SulTRAC 2009). SulTRAC's primary goals for RI/FS field activities at the Plainwell Mill site are to (1) collect split samples that are representative of the PRP's samples, (2) analyze the split samples by methods comparable to the PRP's analytical methods, and (3) compare split sample results to results reported by the PRP. Data generated in the field and by analytical laboratories must meet data quality objectives and measurement performance criteria defined in SulTRAC's site-specific quality assurance project plan (QAPP), which is presented in Attachment B of the SAP (SulTRAC 2009).

2.0 DATA MANAGEMENT STRATEGY

SulTRAC data management strategies require that all data collected from the Plainwell Mill site are stored electronically by the data coordinator, Bethany Hand, and the SulTRAC project manager, Jeffrey Lifka. Data are generated from three types of activities: field activities, laboratory analyses, and data validation. Data from all the activities will be converted to electronic files and archived by SulTRAC's data coordinator. The subsections below describe the data management strategy for data generated from the three types of activities.

2.1 FIELD DATA

The field team will collect split samples as specified in the SAP (SulTRAC 2009). At each location where a split sample is collected, SulTRAC will record sufficient information so that split sample results can be matched with the PRP's sample results. This information will include, but is not limited to, PRP sample identification number, sampling location (including geographic information system [GIS] coordinates), sampling depth, sample matrix, sampling method (including how the sample was split), and other sample collection observations.

After sample collection, SulTRAC will complete sample documentation (sample labels, chain-of-custody records, etc.) as described in Section 8.0 of the FSP, which is presented in Attachment A of the SAP (SulTRAC 2009). A quality control (QC) review will be conducted on the sample documentation. The primary sample documentation steps for the field sampling activities are as follows:

1. The field team collects the samples, records appropriate information in a field logbook, and documents sample information under a chain-of-custody in accordance with the FSP.
2. The field team leader conducts a QC review of sample documentation.
3. Errors in sample documentation are corrected.

4. If the sample documentation is acceptable, samples are packaged and shipped to the off-site laboratory.

2.2 LABORATORY DATA

Split samples collected by SulTRAC will be analyzed by laboratories participating in EPA's CLP. Laboratory data will include results from chemical analyses of split samples, as well as QC results for the respective analyses. The primary sample documentation steps for the laboratory are as follows:

1. A laboratory custodian receives and logs in the samples on the laboratory's custody forms.
2. Problems and corrective actions related to split sample shipment and receipt are reported to the EPA regional sample control coordinator (RSCC), who reports these to the SulTRAC data coordinator and project manager.
3. Laboratory analysts perform the sample analyses.
4. Laboratory analysts and the laboratory supervisor conduct QC reviews of their work.
5. If data QC results are unacceptable, corrective action is taken to remedy the problem, and the samples are reanalyzed if necessary.
6. Problems and corrective actions related to split sample analyses are reported to the EPA RSCC, who reports these to the SulTRAC data coordinator and project manager.

The laboratory will prepare a data package that includes a summary of sample and QC results, a record of chain-of-custody, raw data, and a summary report. Data package deliverables will be consistent with the CLP scope of work. The CLP laboratory will provide the contract-required electronic data deliverables (EDD) to the EPA Region 5 RSCC, who will transmit this information to the SulTRAC data coordinator and project manager.

2.3 DATA VALIDATION

Analytical data from this investigation will undergo data evaluation via computer-aided data review and evaluation (CADRE) processes only. CADRE will be conducted by EPA, and the RSCC will forward the validated data to SulTRAC. SulTRAC's analytical coordinator and project manager will review the case narrative to ensure that project-required criteria have been achieved. Any CADRE-identified data quality issues will be communicated to the EPA work assignment manager in the data validation report prepared for each sampling event.

3.0 DATA MANAGEMENT STRUCTURE

Field log books will be entered and/or scanned and stored electronically by SulTRAC's data coordinator or project manager. All raw chemical data results forwarded by the laboratory will be stored electronically by SulTRAC's data coordinator and forwarded to the project manager for inclusion into the overall Plainwell Mill site electronic database. As a backup, data will also be maintained in hard copy format at the SulTRAC office in Chicago, Illinois. Forms-II Lite software will be used to carry out chain-of-custody procedures for CLP samples.

4.0 REFERENCES

RMT, Inc. 2008. "Multi-Area Field Sampling Plan." 12th Street Landfill, Ostego Township, Michigan, Revision 4, October.

SulTRAC. 2009. "Draft Sampling and Analysis Plan (Field Sampling Plan/Quality Assurance Project Plan) for the Plainwell Mill Site, Operable Unit No. 7 of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site." March^a.

U.S. Environmental Protection Agency (EPA). 2008. "RAC II Region 5 Statement of Work for Remedial Investigation/Feasibility Study Oversight, Operable Unit #7 of the Allied Paper/Portage Creek/Kalamazoo River Site, Kalamazoo County, Michigan." November 3.

^a Estimated month the SulTRAC Sampling and Analysis Plan will be submitted. Actual date will vary depending on the receipt of the final PRP sampling plan.